

June 28, 2004

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20544

Re: In the Matter of the Pay Telephone Reclassification and  
Compensation Provisions of the Telecommunications Act of 1996,  
CC Docket 96-128

Dear Ms. Dortch:

Plant Long Distance Company submits this letter and accompanying certification as record that Plant Long Distance Company is not a "Completing Carrier" as that term is defined in the Commission's Order in CC Docket 96-128 ("Order")<sup>1</sup>, released on October 3, 2003.

As Plant Long Distance Company is not a Completing Carrier nor does it handle the types of calls the Commission has specified as being subject to both compensation and reporting to Payphone Service Providers, Plant Long Distance Company is not subject to such requirements at this time. If Plant Long Distance Company's operations are altered to the extent that Plant Long Distance Company necessarily becomes a Completing Carrier, Plant Long Distance Company will fully comply with the Commission's rules pertaining to this and all other payphone compensation and reporting matters.

Sincerely,

PLANT LONG DISTANCE COMPANY

A handwritten signature in cursive script that reads "Beverly G. Sterling".

Beverly G. Sterling  
President

CC: Azita Sparano, JSI

<sup>1</sup> *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).*

**PAY TELEPHONE COMPLETING CARRIER CERTIFICATION  
OF PLANT LONG DISTANCE COMPANY**

RECEIVED & INSPECTED

JUN 29 2004

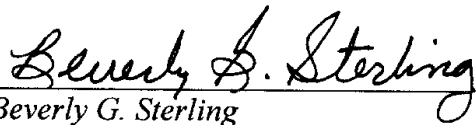
FCC - MAILROOM

1. My name is *Beverly G. Sterling*. I currently serve as the *President* of *PLANT LONG DISTANCE COMPANY*, a provider of interstate interexchange telecommunications services as a toll reseller in the state of *Georgia*. In this capacity, I have become familiar with the network operations of *PLANT LONG DISTANCE COMPANY* and its practices associated with the completion of calls originated from Pay Telephones.
2. PLANT LONG DISTANCE COMPANY is not a Completing Carrier as defined by Commission in 47 CFR § 64.1300.
3. With respect to coinless or access code calls, PLANT LONG DISTANCE COMPANY is a switchless reseller. PLANT LONG DISTANCE COMPANY contracts with TOLY DIGITAL NETWORKS Company for completion of calls originated by access code.
4. With respect to subscriber toll-free payphone calls, PLANT LONG DISTANCE COMPANY is a switchless reseller. PLANT LONG DISTANCE COMPANY contracts with TOLY DIGITAL NETWORKS for completion subscriber toll-free calls.
5. PLANT LONG DISTANCE COMPANY does not perform call validation or processing functions for either access code calls or subscriber toll-free payphone calls.
6. PLANT LONG DISTANCE COMPANY does not create call detail records for either access code calls or subscriber toll-free payphone calls. PLANT LONG DISTANCE COMPANY's action with respect to call detail records is limited to rating and billing.
7. PLANT LONG DISTANCE COMPANY compensates TOLY DIGITAL NETWORKS for the wholesale cost of subscriber toll-free or access code calls.
8. PLANT LONG DISTANCE COMPANY has confirmed with TOLY DIGITAL NETWORKS that any calls purchased by PLANT LONG DISTANCE COMPANY are included in the respective call tracking systems and compensation remittance process of TOLY DIGITAL NETWORKS.
9. In consideration of the aforementioned facts, PLANT LONG DISTANCE COMPANY is not subject to the compensation or reporting requirements related to the Commission's Report and Order<sup>1</sup> and associated revisions to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

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<sup>1</sup> *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996*, CC Docket No. 96-128, Report and Order, (2003) (Order).

I certify under penalty of perjury under the laws of the United States of America  
that the foregoing is true and correct. Executed on June 28<sup>th</sup>, 2004.

  
Beverly G. Sterling  
President  
PLANT LONG DISTANCE COMPANY  
1703 U. S. Highway 82, West  
Tifton, GA 31794